

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

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In the Matter of The Petition of

GRACE OCEAN PRIVATE LIMITED, as Owner Docket No: 1:24-cv-00941
of the M/V DALI,

IN ADMIRALTY

And

SYNERGY MARINE PTE LTD, as Manager of the
M/V DALI,

For Exoneration from or Limitation of Liability.
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**CERTIFICATION OF ROBERT PHELAN, ESQ. IN SUPPORT OF CLAIMANTS'
MOTION TO STRIKE THE CONFIDENTIALITY DESIGNATIONS TO THE M/V
DALI VESSEL EMPLOYEES' DEPOSITION TRANSCRIPTS**

I, Robert Phelan, Esq., counsel for Claimant Ace American Insurance Company, certify that attached hereto in support of Claimants' Motion to Strike the Confidentiality Designations to the M/V Dali Vessel Employees Deposition Transcripts are true and correct copies of:

1. The February 17, 2025, deposition of Captain Chandrashekar Sabhpathy, identified as **Exhibit 1**.
2. The March 10, 2025, confidentiality designations made by Mr. Sabhpathy's counsel, identified as **Exhibit 2**.
3. The February 18, 2025, deposition transcript of Chief Engineer Karthikeyan Deenadayalan, identified as **Exhibit 3**.
4. The March 10, 2025, confidentiality designations made by Mr. Deenadayalan's counsel, identified as **Exhibit 4**.
5. The February 26, 2025, deposition transcript of Electrician Chaminda Kariyawasam, identified as **Exhibit 5**.

6. The March 17, 2025, confidentiality designations made by counsel for Mr. Kariyawasm, identified as **Exhibit 6**.

7. The March 10, 2025, deposition transcript of Bosun Charles Vaz, identified as **Exhibit 7**.

8. The April 2, 2025, confidentiality designations made by counsel for Mr. Vaz as well as First Officer Jyakumar, Second Officer Bisht, Pitchaiah and Oiler Subramanian, identified as **Exhibit 8**.

9. The March 11, 2025, deposition transcript of Second Officer Rohit Singh Bisht, identified as **Exhibit 9**.

10. The March 12, 2025, deposition transcript of First Officer Stephen Fernando Kwinteen Jayakum, identified as **Exhibit 10**.

11. The March 17, 2025, deposition transcript of Oiler Ganeshkumar Subramanian, identified as **Exhibit 11**.

12. The March 17, 2025, deposition transcript of Fourth Engineer Nishanth Pitchaiah, identified as **Exhibit 12**.

Respectfully submitted this 19th day of May 2025.

COZEN O'CONNOR



By: _____

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